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Attorneys for Defendants
13 ALLIED INTERSTATE LLC, SLM EDUCATION CREDIT
FINANCE CORPORATION (erroneously sued as SLM
14 EDUCATION FINANCE CORPORATION), SLM FINANCIAL
CORPORATION and SALLIE MAE, INC.
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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**

18 DAVID R. PEREZ,

19 Plaintiff,

20 v.

21 ALLIED INTERSTATE, LLC, SLM
22 EDUCATION FINANCE CORPORATION,
SLM FINANCIAL CORPORATION;
23 SALLIE MAE, INC. AND DOES 1-10,
INCLUSIVE,

24 Defendants.
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Case No. CV 12-03763 HRL

**JOINT MOTION AND STIPULATION FOR
RELIEF FROM CASE MANAGEMENT
SCHEDULE AND [PROPOSED] ORDER**

Complaint Filed: May 9, 2012

STIPULATION

Plaintiff David R. Perez (“Plaintiff”) and his attorneys of record, The Katharine & George Alexander Community Law Center, by Scott Maurer, attorney at law and Defendants Allied Interstate LLC, SLM Education Credit Finance Corporation (erroneously sued as SLM Education Finance Corporation), SLM Financial Corporation, and Sallie Mae, Inc. (collectively “Defendants”), by their attorneys of record, Ogletree, Deakins, Nash, Smoak & Stewart, P.C., by Jill V. Cartwright, attorney at law, hereby stipulate to the following and respectfully move the Court for an order changing the initial case management conference and ADR deadlines as follows:

1. **WHEREAS**, Plaintiff filed his Complaint on May 9, 2012 in the Santa Clara Superior Court; and

2. **WHEREAS**, on July 18, 2012, prior to its deadline to respond to the Complaint, Defendant Allied Interstate LLC removed the action to the Northern District of California, San Jose Division, with all Defendants consenting to the removal; and

3. **WHEREAS**, on July 18, 2012, the Court issued an Order Setting Initial Case Management Conference and ADR Deadlines; and

4. **WHEREAS**, on July 26, 2012, the Court signed the parties’ Joint Stipulation to Extend Deadline for Defendants’ Response to Plaintiff’s Complaint, giving Defendants until September 14, 2012 to file a responsive pleading in this matter; and

5. **WHEREAS**, the current case management deadlines require the parties to conduct their initial conference regarding initial disclosures, early settlement, ADR process selection, and discovery plan before Defendants file their responsive pleading in this matter; and

6. **WHEREAS**, the parties met and conferred regarding the proposed continuance of the initial case management conference; and

7. **WHEREAS**, pursuant to Local Rule 16-2(d)-(e) and Local Rule 7, the parties hereby submit this stipulation for relief from the case management schedule.

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NOW, THEREFORE, the Parties, through their respective counsel of record **AGREE**
AND HEREBY STIPULATE to the following changes in the initial case management deadlines:

Deadline	Original Date	New Date
Last day to: <ul style="list-style-type: none"> • meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan • File ADR Certification signed by Parties and Counsel • File either Stipulation to ADR Process or Notice of Need for ADR Phone Conference 	September 4, 2012	October 16, 2012
Last day to file Rule 26(f) Report, complete initial disclosures or state objection on Rule 26(f) Report and file Case Management Statement per the Court's Standing Order re: Contents of Joint Case Management Statement	September 18, 2012	October 30, 2012
Initial Case Management Conference in Courtroom 2, 5th Floor SJ at 1:30 pm	September 25, 2012	November 6, 2012

DATED: August 30, 2012

KATHARINE & GEORGE ALEXANDER
 COMMUNITY LAW CENTER

By: /s/ Scott Maurer
 Scott Maurer

Attorney for Plaintiff
 DAVID R. PEREZ

1 DATED: August 30, 2012

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

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5 By: /s/ Jill V. Cartwright

Erica K. Rocush
Jill V. Cartwright

6
7 Attorneys for Defendants
ALLIED INTERSTATE LLC, SLM
EDUCATION CREDIT FINANCE
CORPORATION (erroneously sued as SLM
EDUCATION FINANCE CORPORATION),
8 SLM FINANCIAL CORPORATION and
9 SALLIE MAE, INC.

10 **ATTESTATION PER GENERAL ORDER NO. 45 SECTION X.B.**

11 I hereby attest that I have obtained concurrence in the filing of this document from each of
12 the signatories listed above.

13 DATED: August 30, 2012

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

14
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16 By: /s/ Jill V. Cartwright

17 Erica K. Rocush
18 Jill V. Cartwright

19 Attorneys for Defendants

20 ALLIED INTERSTATE LLC, SLM
EDUCATION CREDIT FINANCE
CORPORATION (ERRONEOUSLY SUED AS
21 SLM EDUCATION FINANCE
CORPORATION), SLM FINANCIAL
22 CORPORATION AND SALLIE MAE, INC.

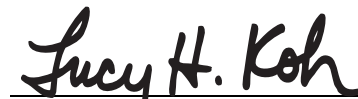
[PROPOSED] ORDER

Pursuant to the Joint Stipulation for Relief from Case Management Schedule it is hereby ordered that the Case Management deadlines are modified as follows:

Deadline	Original Date	New Date
Last day to: <ul style="list-style-type: none"> Meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan File ADR Certification signed by Parties and Counsel File either Stipulation to ADR Process or Notice of Need for ADR Phone Conference 	September 4, 2012	October 16, 2012
Last day to file Rule 26(f) Report, complete initial disclosures or state objection on Rule 26(f) Report and file Case Management Statement per the Court's Standing Order re Contents of Joint Case Management Statement	September 18, 2012	October 30, 2012
Initial Case Management Conference in Courtroom 2, 5th Floor SJ at 1:30 pm	September 25, 2012	November 6, 2012

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: December 28, 2012



Hon. ~~Howard R. Lloyd~~ Lucy H. Koh
Magistrate Judge of the United States District Court